

**GOVERNMENT’S RESPONSE TO DEFENDANT GEORGE MATIN’S
SECOND MOTION FOR EXTENSION OF REPORT DATE**

The Court is well familiar with the facts of this case, summarized in various filings, including the government’s statement filed on January 4, 2021. Doc. 50. While

the government appreciates that defendant Matin would prefer to seek treatment for his kidney stone and receive exploratory surgery outside of prison, the government does not believe that such a desire is an adequate reason to continue his reporting date. Defendant Matin's concerns regarding COVID-19, however, are another matter. The government recognizes the difficulties and risks that this global health crisis has posed for defendants and the BOP alike. For this reason, in early January 2021 the government supported the defendant's original motion for continuance to protect the health of the defendant, to further BOP's goal to limit the prison population to the extent possible in order to promote social distancing of inmates and conserve BOP resources during this challenging time, and to assure that defendant Matin will fully serve the full, appropriate sentence imposed by the Court.

Unfortunately, defendant Matin has not yet received a vaccine for COVID-19. Now that approved and apparently efficacious vaccines are available, we believe that it is prudent that the defendant delay self-surrender until 28 days after he receives the final dose of an FDA-approved vaccine. The Court should require the defendant to make all good faith efforts to obtain the vaccine, and to keep the Court apprised of those efforts, so the Court can be assured that the defendant is not engaging in delay.

For these reasons, the government supports the defendant's request for a delay in the date of his self-surrender.

Respectfully yours,

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CERTIFICATE OF SERVICE

I hereby certify that this pleading has been served on the Filing User identified below through the Electronic Case Filing (ECF) system:

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Dated: March 1, 2021